

The Examiner rejects claim 1 over a primary reference to Gupta. Gupta discloses a caching proxy owned by an ISP which collects and stores information on users in order to create a user profile. Gupta discloses:

[0017] Instead of transmitting the information from the server that maintains the information, some systems utilize what is referred to as a proxy. Referring to FIG. 1, a proxy 102 is a server that carries out requests transmitted to it (i.e., from client 100), keeping copies of fetched documents or information for some time so that they can be accessed more quickly in the future, speeding up access for commonly requested information. This maintaining of information and fetched documents by the proxy 102 is referred to as caching and the information maintained in the proxy 102 is referred to as a cache or proxy cache. (Emphasis added).

The user in Gupta is assigned an IP address on the Internet, an external network. Requests for information, such as a web page residing at a URL, are sent from the user to a caching proxy on the external network:

[0053] For most users to access the internet, an ISP is utilized. To utilize an ISP, an off-line relationship between the user and the ISP is established wherein the user sets up an account with the ISP by supplying the user's name, address, and other relevant information (e.g., credit card number for payment, credit rating, etc.). In exchange, the ISP assigns a user name, password, and potentially a static IP address (or a dynamic IP address if dial in access is utilized) to the user. Additionally, the ISP may obtain information for other off-line sources.

[0054] Proxies (as described above) are usually owned and provided by a user's ISP. To access the internet, the user establishes a connection with the ISP or proxy. The user or client then requests a URL from a web server. The proxy intercepts the request, searches its cache for the requested information and returns the information to the client if the information is in the proxy's cache. If not in cache, the proxy communicates with the web server, retrieves the information, and forwards the information to the client. (Emphasis added).

In Gupta, the caching proxy builds and maintains the user's profile. The user profile contains demographic information, including a user's residence. Gupta at [0035], [0037]. Gupta builds the user profile based on the information which passes through the caching proxy and discloses a server on the external network retrieving the user's profile information from the caching proxy:

[0055] Since the ISP or proxy is utilized to conduct all internet access, when a user views a web page or completes any transactions on the internet, each and every user action is processed through the ISP or a proxy of the ISP. Consequently, the ISP has the ability to maintain statistics on the user and the user's internet viewing (referred to as user information or profile information) transparently to the user (without the user's knowledge). More specifically, the ISP has the ability maintain a user's profile consisting of demographic information such as the user's age, credit history, earnings, interests, purchases, the sites (URLs) the user has accessed, the amount of time spent on each and every web site (URL), other user network accesses (such as emails, news readings/postings, etc.), and information when the user posts data or conducts searches (e.g., from queries/messages from a web server).

[0057] Profile information may be collected and maintained by a proxy in an Online Profile Management System. FIG. 3 demonstrates the relationship of an Online Profile Management System 300 with a client 100, server 104, and proxy 102. As described above, all URL requests, text, and other information is transmitted from client 100 to proxy 102. Proxy 102 copies this information and stores it locally in a raw database 302. Thus, each time client 100 initiates a request for a URL, information regarding the request is stored in raw database 302.

[0060] In addition to the above, a user or client 100 may roam into another ISP. This may occur when a user is traveling and dials into a phone number for a third party ISP or when the web browser utilizes the proxy of a third party ISP, for example. When client 100 roams into another ISP, the ISP may forward the request to the user's home ISP for local advertisement insertion (as described below), the ISP may obtain the profile information from the user's home ISP and use it for advertisement insertion, or the user's roaming profile can be returned to the home ISP. The above

options and other options are demonstrated in FIG. 4, for example. If client 400 is roaming and utilizes ISP2 404, ISP2 404 may retrieve or purchase the user's profile from the user's standard ISP, ISP1 402. Under such an option, client 400 utilizes pathways B, C, and E to access web server 406. Alternatively, ISP2 may act as a path through for ISP1 with ISP1 providing the access to web server 406. Under this option, client 400 utilizes pathways B, C, and D to access web server 406 and ISP1 402 will perform any advertisement insertion. In another embodiment, ISP2 utilizes the current access profile of client 400 to place any advertisements. Under this embodiment, client 400 utilizes pathways B and E to access web server 406. In another embodiment, ISP2 404 negotiates with web server 406 for an advertisement insert and after concluding negotiations, offers ISP1 402 the option of inserting the advertisement for the same or an increased price. Under this option, client 400 utilizes pathways B, E, and C to access web server 406. In each of the above roaming user embodiments, ISP2 404 can return or sell the dynamically generated user profile (for that online session) to the user's standard ISP, ISP1 402. (Emphasis added).

As seen above, Gupta uses words such as 'home ISP', 'third party ISP', and 'proxy' to refer to various systems or segments on a network. Each of the disclosed systems or segments of Gupta, including the caching proxy, resides on the Internet, an external network. Accordingly, Gupta discloses determining the location of a user by retrieving the user's profile information from a caching proxy or ISP on the external network.

Claim 1 of the Application recites a method for obtaining the geographic location of an Internet user who accesses an external network from a private network through a proxy server. As seen in Fig. 15 of the Application, the user of claim 1 is connected to an internal network and has an internal network address which is not directly known to or accessible from the external network. Application page 38, lines 6-22; page 40, lines 3-16. The proxy of claim 1 provides the user access to the external network by mapping between the user's internal network address and an external address associated with the user. Id. The internal network also contains an internal server which determines the user's location. Like the user of claim 1, the internal server is not directly accessible from the external network. Thus, when a user on an internal network

accesses an external network through a proxy server as in the Application, the method of claim 1 advantageously determines the location of the user by 'looking behind' the proxy to a server on the internal network.

To support a rejection of claim 1 as anticipated by Gupta, the Office Action states:

As per claim 1, Gupta teaches the invention as claimed wherein a method for obtaining a geographic location of an Internet user that accesses an external network (external network being the external/foreign ISP [0060]) from a private network (private network being home ISP [0060]) through a proxy server ([0054], wherein ISP and proxy are analogous), comprising:

...  
redirecting by the external server the request for information to an internal server of the private network ([0055], [0057], [0060], the 3<sup>rd</sup> party advertisers can request for the user profile information from the private network proxy, this request is forwarded towards the home ISP for user profile data); the internal server determining the geographic location of the Internet user ([0033], [0055], [0057]): (Emphasis added).

Claim 1 recites in relevant part:

redirecting by the external server the request for information to an internal server of the private network, the internal server determining the geographic location of the Internet user;  
(Emphasis added).

In view of the citations from Gupta, the Applicant respectfully asserts that Gupta does not teach or disclose a user and an internal server on an internal network or redirecting a request for information to an internal server on the internal network as recited in claim 1. Since in Gupta the user's profile information is stored and retrieved from systems on an external network, Gupta logically does not disclose a user and an internal server on an internal network or a proxy which provides access to the external network as recited in claim 1. In contrast to Gupta wherein a caching proxy or ISP on the external network collects and provides a user's profile information, claim 1 recites redirecting a request for information to an internal server on the private network in order to determine the user's location. Thus, the Applicant asserts that claim 1 is allowable for at least the reason that Gupta does not disclose the step of redirecting by an external server

the request for information to an internal server of the private network as recited in claim 1. Similarly, claim 1 is also allowable for at least the reason that Gupta does not disclose the step of receiving by the external server the geographic location from the internal server within the private network as recited in claim 1.

The remainder of the claims are allowable for at least the reasons given for the allowability of claim 1, or for at least the reason that each depends from an allowable claim.

### **CONCLUSION**

In view of the above, each of the presently pending claims in the Application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass the application to issue. The Commissioner is hereby authorized to charge any additional fees which may be required, or credit any overpayment to Deposit Account No. 14-0629.

Respectfully submitted,

NEEDLE & ROSENBERG, P.C.

/Jason S. Jackson/

Jason S. Jackson

Registration No. 56,733

NEEDLE & ROSENBERG, P.C.  
Customer Number 23859  
(678) 420-9300  
(678) 420-9301 (fax)